

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CISCO SYSTEMS, INC. and ACACIA	)	
COMMUNICATIONS, INC.,	)	
	)	
Plaintiffs and Counterclaim Defendants,	)	
	)	C.A. No. 21-1365-GBW
v.	)	
	)	<b>JURY TRIAL DEMANDED</b>
RAMOT AT TEL A VIV UNIVERSITY	)	
LTD.,	)	
	)	
Defendant and Counterclaimant.	)	
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CISCO SYSTEMS, INC. and	)	
ACACIA COMMUNICATIONS, INC.,	)	
	)	
Plaintiffs and Counterclaim Defendants,	)	C.A. No. 22-674-GBW
	)	(CONSOLIDATED)
v.	)	
	)	
RAMOT AT TEL AVIV UNIVERSITY LTD.,	)	
	)	
Defendant and Counterclaimant.	)	

**[PROPOSED] ORDER GRANTING DEFENDANT AND COUNTERCLAIMANT  
RAMOT’S MOTION TO COMPEL**

Having considered Defendant and Counterclaimant Ramot at Tel Aviv University Ltd.’s (“Ramot”) Motion to Compel, **IT IS HEREBY ORDERED** that:

1. Defendant’s Motion to Compel is GRANTED.
2. Plaintiffs and Counterclaim Defendants Cisco Systems, Inc. (“Cisco”) and Acacia Communications, Inc. (“Acacia”) shall produce sales data for the products (including the switch, router line cards, and chassis products, as well as bundled product IDs to the extent they exist) identified in Ramot’s Final Infringement Contentions. The sales data required by this Paragraph shall include all fields found

in Cisco-Ramot\_10023244 as well as “sales order” “Deal ID” “invoice number” and “Bundled PID” fields.

3. Cisco and Acacia shall separately produce the invoice (or purchase order) data for all accused products (including the accused switch, router line cards, and chassis products) by querying the Hyperion database for the “invoice number” “sales order” “Deal ID” or “Bundled PID” that resulted from the query described in Paragraph 2 and producing all sales data returned thereby. The invoice (or purchase order) data required by this Paragraph shall include all fields found in Cisco-Ramot\_10023244, as well as “sales order” “Deal ID” “invoice number” and “Bundled PID” fields.
4. Cisco and Acacia shall supplement their response to Ramot’s Interrogatory No. 25 and shall provide a narrative response thereto.
5. Cisco and Acacia shall produce technical data (and financial data to the extent not covered in the preceding Paragraphs) for the products identified in Ramot’s Final Infringement Contentions, including the information expressly identified as missing in those contentions, and information sufficient to show how the DSP chips in the accused products are configured., including internal register settings programmed by the firmware to enable, calibrate, or provision accused features. This shall include the firmware and configuration files or data referenced in Mr. Geyer’s December 12, 2024 deposition.

Cisco and Acacia shall comply with this Order within 14-days of this date.

SO ORDERED, this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

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UNITED STATES DISTRICT JUDGE